

July 5, 2007

Patricia Schroeder
American Nuclear Society
555 North Kensington Avenue
La Grange Park, IL 60526

Dear Ms. Schroeder:

SUBJECT: ANS-15.19 N-17 COMMITTEE BALLOT

Enclosed is my ballot for ANS-15.19-200x, "Shipment and Receipt of Special Nuclear Material (SNM) by Research Reactor Facilities." I have voted "Not Approved." Comments are attached which identify a number of errors in the standard. We did not perform a comprehensive review of the standard. However, our review was sufficient to determine that the standard as written is outdated and following the standard could lead to noncompliance with international and domestic transportation safety regulations. We suggest that the standard be withdrawn and rewritten.

If you have any questions concerning this ballot, please contact me at 301-415-1127.

Sincerely,

/RA/

Alexander Adams, Jr., Senior Project Manager
Research and Test Reactors Branch A
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

Enclosure: As stated

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American Nuclear Society
555 North Kensington Avenue
La Grange Park, IL 60526

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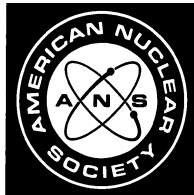
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BALLOT OF THE AMERICAN NUCLEAR SOCIETY

N17 – Research Reactors, Reactor Physics, Radiation Shielding & Computational Methods

Proposed standard's

- * Numerical Designation: *ANS-15.19-200x*
- * Version: *New Standard*
- * Title: American National Standard Shipment and Receipt of Special Nuclear Material (SNM) by Research Reactor Facilities”

Vote Closes: July 8, 2007

Please indicate your vote:

Approved

Approved with comments (Comments Appended)

Not Approved (Comments Appended)

X

Indicate by asterisk () those comments which require satisfactory resolution to effect change of your vote and designate those comments by number on the comment form.*

Not Voting (Reasons Appended)

Date: July 3, 2007

Name: Alexander Adams Jr., USNRC

[Please PRINT or TYPE]

Signature_____

Please return vote and comments:

**Patricia Schroeder
American Nuclear Society
555 North Kensington Avenue
La Grange Park, IL 60526

Telephone: 708/579-8269
FAX: 708/352-6464
E-Mail: pschroeder@ans.org**

NRC Document Review

Document Title: AMERICAN NATIONAL STANDARD SHIPMENT AND RECEIPT OF SNM BY RESEARCH REACTORS

Item #	Document Section	Comments / Notes
1	Cover Page	Reactor is misspelled (Rector)
2	Page 2, Para 2, Foreword	NUREG is misspelled (NUWREG)
3	Definitions, fissile material	Pu-238 is not a fissile material
	Definitions, LSA-I	Given definitions for LSA-I (i) and (iv) have changed, standard does not match regulations (10 CFR 71.4)
	Definitions, radioactive material	70 Bq/g is no longer used.
4	Page 4, Section 5.1, Note that page numbers appear to repeat	NR Form 741 should be NRC Form 741.
5	Page 5, Section 2	"fission, chambers" should read "fission chambers" (delete comma)
6	Section 6.1.4(2)	UN2918 no longer refers to radioactive material, fissile, n.o.s. The term "n.o.s." is obsolete.
7	Section 6.2.1	DOT no longer recognizes "strong, tight" packages in its regulations
8	Section 6.4	The Transport Index is no longer determined for criticality control purposes, that is accomplished using the Criticality Safety Index (CSI).
9	Page 11, Section 8.1.1	Recommend revising "This SNM of low strategic significance. The following safeguards and security measures shall be applied to shipments." The subsequent sections, 8.1.1.1, 8.1.1.2 and 8.1.1.3 provide a summary of the requirements instead of a complete description. Suggested text: "Physical protection requirements for SNM-LSS in transit are described in 10 CFR 73.67. The following sections summarize these requirements."
10	Page 11, Section 8.1.1.3	Recommend revising section 8.1.1.3 to be consistent with the requirements of 73.67(g). 10 CFR 73.67(g) requires the licensee (or the shipper, or receiver) conduct immediately a trace investigation of any shipment that is lost or unaccounted for after the estimated arrival time. Also recommend, no specific response time. Licensees should "immediately" begin investigations into lost or unaccounted for shipments. The specified "24 hours" could mislead a licensee.
11	Page 12, Section 8.2	Recommend revising the 2 nd sentence to "It may take three to six months to arrange the shipping details, i.e. preparing the transportation security plan , obtaining route approvals and state permits and scheduling escorts."
12	Page 12, Section 8.2.2, second sentence	Recommend revising the second sentence to "The selection should be based on DOT requirements , carriers recommendations, NRC or DOE recommendations, and based on coordination with the States, as appropriate . Where possible, the route should avoid heavily populated areas (areas with populations over 100,000) by the use of beltways." (Add DOT requirements to the sentence. The shipper coordinating the route should work with the appropriate State officials during its development.)
13	Page 12, Section 8.2.2	Recommend deleting the 3 rd sentence, "Transportation within three miles of a heavily populated area requires escorts as detailed in NUREG-0561." This statement is misleading.

14	Page 12, Section 8.2.2	Recommend deleting the note "States and other jurisdictions may have escort and other requirements exceeding the requirements of federal regulations." The statement is misleading.
15	Page 12, Section 8.2.3	Recommend adding in that an updated list of governor's designees is maintained on the NRC website. The NRC website is frequently updated and can provide more current information than the annual Federal Register Notice.